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7
8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
10

11 JENNIE QUAN, individually and as
12 successor in interest to BENJAMIN
CHIN, deceased,

13 Plaintiff,

14 v.

15 COUNTY OF LOS ANGELES; and
16 DOES 1-10, inclusive,

17 Defendants.

Case No. 2:24-cv-04805-MCS(KSx)

**DEFENDANT COUNTY OF LOS
ANGELES' ANSWER TO
PLAINTIFF JENNIE QUAN'S
COMPLAINT: DEMAND FOR
JURY TRIAL**

[Assigned to Hon. Mark C. Scarsi,
Courtroom "7C"]

18
19 Defendant COUNTY OF LOS ANGELES' ("Defendant"), for itself and no
20 other person, firm or corporation, answers the Complaint of Plaintiff JENNIE QUAN
21 ("Plaintiff") as follows:

22 **INTRODUCTION**

23 1. Answering Paragraph 1, Defendant lacks sufficient knowledge or
24 information to form a belief concerning the truth of the factual allegations contained
25 therein and on that basis denies such allegations.

26 **JURISDICTION AND VENUE**

27 2. Answering Paragraph 2, Defendant admits that the United States Central
28 District Court of California has jurisdiction over Plaintiff's causes of action.

1 therein and on that basis denies such allegations. Paragraph 10 further contains legal
2 conclusions and argument as to which no response is required.

3 11. Answering Paragraph 11, Defendant lacks sufficient knowledge or
4 information to form a belief concerning the truth of the factual allegations contained
5 therein and on that basis denies such allegations. Paragraph 11 further contains legal
6 conclusions and argument as to which no response is required.

7 12. Answering Paragraph 12, Defendant lacks sufficient knowledge or
8 information to form a belief concerning the truth of the factual allegations contained
9 therein and on that basis denies such allegations. Paragraph 12 further contains legal
10 conclusions and argument as to which no response is required.

11 13. Answering Paragraph 13, Defendant lacks sufficient knowledge or
12 information to form a belief concerning the truth of the factual allegations contained
13 therein and on that basis denies such allegations. Paragraph 13 further contains legal
14 conclusions and argument as to which no response is required.

15 14. Answering Paragraph 14, Defendant lacks sufficient knowledge or
16 information to form a belief concerning the truth of the factual allegations contained
17 therein and on that basis denies such allegations. Paragraph 14 further contains legal
18 conclusions and argument as to which no response is required.

19 15. Answering Paragraph 15, Defendant is without sufficient knowledge or
20 information to form a belief as to the truth of the allegations contained in said
21 paragraph, on that basis, deny each and every allegation against this Defendant
22 contained herein. Paragraph 15 further contains legal conclusions and argument as to
23 which no response is required.

24 **FACTS COMMON TO ALL CLAIMS FOR RELIEF**

25 16. Answering Paragraph 16, which incorporates by reference the
26 allegations of other paragraphs of the pleading, Defendant to the same extent
27 incorporates by reference the answers provided herein to those paragraphs.
28

1 17. Answering Paragraph 17, Defendant lacks sufficient knowledge or
2 information to form a belief concerning the truth of the factual allegations contained
3 therein and on that basis denies such allegations. Paragraph 17 further contains legal
4 conclusions and argument as to which no response is required.

5 18. Answering Paragraph 18, Defendant lacks sufficient knowledge or
6 information to form a belief concerning the truth of the factual allegations contained
7 therein and on that basis denies such allegations. Paragraph 18 further contains legal
8 conclusions and argument as to which no response is required.

9 19. Answering Paragraph 19, Defendant lacks sufficient knowledge or
10 information to form a belief concerning the truth of the factual allegations contained
11 therein and on that basis denies such allegations. Paragraph 19 further contains legal
12 conclusions and argument as to which no response is required.

13 20. Answering Paragraph 20, Defendant lacks sufficient knowledge or
14 information to form a belief concerning the truth of the factual allegations contained
15 therein and on that basis denies such allegations. Paragraph 20 further contains legal
16 conclusions and argument as to which no response is required.

17 21. Answering Paragraph 21, Defendant lacks sufficient knowledge or
18 information to form a belief concerning the truth of the factual allegations contained
19 therein and on that basis denies such allegations. Paragraph 21 further contains legal
20 conclusions and argument as to which no response is required.

21 22. Answering Paragraph 22, Defendant lacks sufficient knowledge or
22 information to form a belief concerning the truth of the factual allegations contained
23 therein and on that basis denies such allegations. Paragraph 22 further contains legal
24 conclusions and argument as to which no response is required.

25 23. Answering Paragraph 23, Defendant lacks sufficient knowledge or
26 information to form a belief concerning the truth of the factual allegations contained
27 therein and on that basis denies such allegations. Paragraph 23 further contains legal
28 conclusions and argument as to which no response is required.

24. Answering Paragraph 24, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein and on that basis denies such allegations. Paragraph 24 further contains legal conclusions and argument as to which no response is required.

25. Answering Paragraph 25, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein and on that basis denies such allegations. Paragraph 25 further contains legal conclusions and argument as to which no response is required.

26. Answering Paragraph 26, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein and on that basis denies such allegations. Paragraph 47 further contains legal conclusions and argument as to which no response is required.

FIRST CLAIM FOR RELIEF

Unreasonable Search and Seizure – Excessive Force (42 U.S.C. § 1983)

(Against Defendants DOE DEPUTIES)

27. Answering Paragraph 27, which incorporates by reference the allegations of other paragraphs of the pleading, Defendant to the same extent incorporates by reference the answers provided herein to those paragraphs.

28. Answering Paragraph 28, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein and on that basis denies such allegations. Paragraph 28 further contains legal conclusions and argument as to which no response is required. Moreover, Plaintiff's allegations in said paragraph are overbroad, vague, and ambiguous and thus Defendant denies each and every remaining allegation in said paragraph.

29. Answering Paragraph 29, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein and on that basis denies such allegations. Paragraph 29 further contains legal conclusions and argument as to which no response is required. Moreover, Plaintiff's

1 allegations in said paragraph are overbroad, vague, and ambiguous and thus
2 Defendant denies each and every remaining allegation in said paragraph.

3 30. Answering Paragraph 30, Defendant lacks sufficient knowledge or
4 information to form a belief concerning the truth of the factual allegations contained
5 therein and on that basis denies such allegations. Paragraph 30 further contains legal
6 conclusions and argument as to which no response is required. Moreover, Plaintiff's
7 allegations in said paragraph are overbroad, vague, and ambiguous and thus
8 Defendant denies each and every remaining allegation in said paragraph.

9 31. Answering Paragraph 31, Defendant lacks sufficient knowledge or
10 information to form a belief concerning the truth of the factual allegations contained
11 therein and on that basis denies such allegations. Paragraph 31 further contains legal
12 conclusions and argument as to which no response is required. Moreover, Plaintiff's
13 allegations in said paragraph are overbroad, vague, and ambiguous and thus
14 Defendant denies each and every remaining allegation in said paragraph.

15 32. Answering Paragraph 32, Defendant lacks sufficient knowledge or
16 information to form a belief concerning the truth of the factual allegations contained
17 therein and on that basis denies such allegations. Paragraph 32 further contains legal
18 conclusions and argument as to which no response is required. Moreover, Plaintiff's
19 allegations in said paragraph are overbroad, vague, and ambiguous and thus
20 Defendant denies each and every remaining allegation in said paragraph.

21 33. Answering Paragraph 33, Defendant lacks sufficient knowledge or
22 information to form a belief concerning the truth of the factual allegations contained
23 therein and on that basis denies such allegations. Paragraph 33 further contains legal
24 conclusions and argument as to which no response is required.

25 34. Answering Paragraph 34, Defendant lacks sufficient knowledge or
26 information to form a belief concerning the truth of the factual allegations contained
27 therein and on that basis denies such allegations. Paragraph 34 further contains legal
28 conclusions and argument as to which no response is required. Moreover, Plaintiff's

1 allegations in said paragraph are overbroad, vague, and ambiguous and thus
2 Defendant denies each and every remaining allegation in said paragraph.

3 35. Answering Paragraph 35, Defendant is without sufficient knowledge or
4 information to form a belief as to the truth of the allegations contained in said
5 paragraph, on that basis, deny each and every allegation against this Defendant
6 contained herein. Defendant further denies the allegations of said paragraph as they
7 are vague. Defendant denies that Plaintiff is entitled to an award of damages, or any
8 other form of relief as requested in the Complaint as a result of any acts or omissions
9 by this answering Defendant. Paragraph 35 further contains legal conclusions and
10 argument as to which no response is required.

11 **SECOND CLAIM FOR RELIEF**

12 **Unreasonable Search and Seizure – Denial of Medical Care (42 U.S.C. § 1983)**

13 (Against Defendants DOE DEPUTIES)

14 36. Answering Paragraph 36, which incorporates by reference the
15 allegations of other paragraphs of the pleading, Defendant to the same extent
16 incorporates by reference the answers provided herein to those paragraphs.

17 37. Answering Paragraph 37, Defendant lacks sufficient knowledge or
18 information to form a belief concerning the truth of the factual allegations contained
19 therein and on that basis denies such allegations. Paragraph 37 further contains legal
20 conclusions and argument as to which no response is required. Moreover, Plaintiff's
21 allegations in said paragraph are overbroad, vague, and ambiguous and thus
22 Defendant denies each and every remaining allegation in said paragraph.

23 38. Answering Paragraph 38, Defendant lacks sufficient knowledge or
24 information to form a belief concerning the truth of the factual allegations contained
25 therein and on that basis denies such allegations. Paragraph 38 further contains legal
26 conclusions and argument as to which no response is required. Moreover, Plaintiff's
27 allegations in said paragraph are overbroad, vague, and ambiguous and thus
28 Defendant denies each and every remaining allegation in said paragraph.

1 39. Answering Paragraph 39, Defendant lacks sufficient knowledge or
2 information to form a belief concerning the truth of the factual allegations contained
3 therein and on that basis denies such allegations. Paragraph 39 further contains legal
4 conclusions and argument as to which no response is required.

5 40. Answering Paragraph 40, Defendant lacks sufficient knowledge or
6 information to form a belief concerning the truth of the factual allegations contained
7 therein and on that basis denies such allegations. Paragraph 40 further contains legal
8 conclusions and argument as to which no response is required. Moreover, Plaintiff's
9 allegations in said paragraph are overbroad, vague, and ambiguous and thus
10 Defendant denies each and every remaining allegation in said paragraph.

11 41. Answering Paragraph 41, Defendant lacks sufficient knowledge or
12 information to form a belief concerning the truth of the factual allegations contained
13 therein and on that basis denies such allegations. Paragraph 41 further contains legal
14 conclusions and argument as to which no response is required. Moreover, Plaintiff's
15 allegations in said paragraph are overbroad, vague, and ambiguous and thus
16 Defendant denies each and every remaining allegation in said paragraph.

17 42. Answering Paragraph 42, Defendant lacks sufficient knowledge or
18 information to form a belief concerning the truth of the factual allegations contained
19 therein and on that basis denies such allegations. Paragraph 42 further contains legal
20 conclusions and argument as to which no response is required.

21 43. Answering Paragraph 43, Defendant lacks sufficient knowledge or
22 information to form a belief concerning the truth of the factual allegations contained
23 therein and on that basis denies such allegations. Paragraph 43 further contains legal
24 conclusions and argument as to which no response is required. Moreover, Plaintiff's
25 allegations in said paragraph are overbroad, vague, and ambiguous and thus
26 Defendant denies each and every remaining allegation in said paragraph.

27 44. Answering Paragraph 44, Defendant is without sufficient knowledge or
28 information to form a belief as to the truth of the allegations contained in said

1 paragraph, on that basis, deny each and every allegation against this Defendant
2 contained herein. Defendant further denies the allegations of said paragraph as they
3 are vague. Defendant denies that Plaintiff is entitled to an award of damages, or any
4 other form of relief as requested in the Complaint as a result of any acts or omissions
5 by this answering Defendant.

6 **THIRD CLAIM FOR RELIEF**

7 **Municipal Liability – Ratification (42 U.S.C. § 1983)**

8 45. Answering Paragraph 45, which incorporates by reference the
9 allegations of other paragraphs of the pleading, Defendant to the same extent
10 incorporates by reference the answers provided herein to those paragraphs.

11 46. Answering Paragraph 46, Defendant lacks sufficient knowledge or
12 information to form a belief concerning the truth of the factual allegations contained
13 therein and on that basis denies such allegations. Paragraph 46 further contains legal
14 conclusions and argument as to which no response is required.

15 47. Answering Paragraph 47, Defendant lacks sufficient knowledge or
16 information to form a belief concerning the truth of the factual allegations contained
17 therein and on that basis denies such allegations. Paragraph 47 further contains legal
18 conclusions and argument as to which no response is required.

19 48. Answering Paragraph 48, Defendant denies that a policymaker knew of
20 and specifically approved of Defendant Doe Deputies' acts to use excessive force
21 against Plaintiff as well as the unreasonable detention and arrest of Decedent and
22 denial of medical care. As to the remainder of the allegations contained in said
23 paragraph, Defendant is without sufficient knowledge or information to form a belief
24 as to the truth of the allegations contained in said paragraph, and on that basis,
25 Defendant denies each and every allegation. Paragraph 48 further contains legal
26 conclusions and argument as to which no response is required.

27 49. Answering Paragraph 49, Defendant lacks sufficient knowledge or
28 information to form a belief concerning the truth of the factual allegations contained

1 therein and on that basis denies such allegations. Paragraph 49 further contains legal
2 conclusions and argument as to which no response is required.

3 50. Defendant is without sufficient knowledge or information to form a
4 belief as to the truth of the allegations contained in said paragraph, on that basis, deny
5 each and every allegation against this Defendant contained herein. Defendant further
6 denies the allegations of said paragraph as they are vague. Defendant denies that
7 Plaintiff is entitled to an award of damages, or any other form of relief as requested
8 in the Complaint as a result of any acts or omissions by this answering Defendant.

9 51. Defendant is without sufficient knowledge or information to form a
10 belief as to the truth of the allegations contained in said paragraph, on that basis, deny
11 each and every allegation against this Defendant contained herein. Defendant further
12 denies the allegations of said paragraph as they are vague. Defendant denies that
13 Plaintiff is entitled to an award of damages, or any other form of relief as requested
14 in the Complaint as a result of any acts or omissions by this answering Defendant.

15 52. Defendant is without sufficient knowledge or information to form a
16 belief as to the truth of the allegations contained in said paragraph, on that basis, deny
17 each and every allegation against this Defendant contained herein. Defendant further
18 denies the allegations of said paragraph as they are vague. Defendant denies that
19 Plaintiff is entitled to an award of damages, or any other form of relief as requested
20 in the Complaint as a result of any acts or omissions by this answering Defendant.

21 **FOURTH CLAIM FOR RELIEF**

22 **Municipal Liability – Failure to Train (42 U.S.C. § 1983)**

23 (Against Defendants COUNTY and DOES 6-10)

24 53. Answering Paragraph 53, which incorporates by reference the
25 allegations of other paragraphs of the pleading, Defendant to the same extent
26 incorporates by reference the answers provided herein to those paragraphs.

27 54. Answering Paragraph 54, Defendant lacks sufficient knowledge or
28 information to form a belief concerning the truth of the factual allegations contained

1 therein and on that basis denies such allegations. Paragraph 54 further contains legal
2 conclusions and argument as to which no response is required.

3 55. Answering Paragraph 55, Defendant lacks sufficient knowledge or
4 information to form a belief concerning the truth of the factual allegations contained
5 therein and on that basis denies such allegations. Paragraph 55 further contains legal
6 conclusions and argument as to which no response is required.

7 56. Answering Paragraph 56, Defendant denies each and every allegation
8 contained therein.

9 57. Answering Paragraph 57, Defendant denies each and every allegation
10 contained therein.

11 58. Answering Paragraph 58, Defendant denies each and every allegation
12 contained therein.

13 59. Answering Paragraph 59, Defendant is without sufficient knowledge or
14 information to form a belief as to the truth of the allegations contained in said
15 paragraph, on that basis, deny each and every allegation against this Defendant
16 contained herein. Defendant further denies the allegations of said paragraph as they
17 are vague. Defendant denies that Plaintiff is entitled to an award of damages, or any
18 other form of relief as requested in the Complaint as a result of any acts or omissions
19 by this answering Defendant.

20 60. Answering Paragraph 60, Defendant is without sufficient knowledge or
21 information to form a belief as to the truth of the allegations contained in said
22 paragraph, on that basis, deny each and every allegation against this Defendant
23 contained herein. Defendant further denies the allegations of said paragraph as they
24 are vague. Defendant denies that Plaintiff is entitled to an award of damages, or any
25 other form of relief as requested in the Complaint as a result of any acts or omissions
26 by this answering Defendant.

27 61. Answering Paragraph 61, Defendant is without sufficient knowledge or
28 information to form a belief as to the truth of the allegations contained in said

1 paragraph, on that basis, deny each and every allegation against this Defendant
 2 contained herein. Defendant further denies the allegations of said paragraph as they
 3 are vague. Defendant denies that Plaintiff is entitled to an award of damages, or any
 4 other form of relief as requested in the Complaint as a result of any acts or omissions
 5 by this answering Defendant.

6 **FIFTH CLAIM FOR RELIEF**

7 **Municipal Liability – Unconstitutional Custom or Policy (42 U.S.C. § 1983)**

8 (Against Defendants COUNTY and DOES 6-10)

9 62. Answering Paragraph 62, which incorporates by reference the
 10 allegations of other paragraphs of the pleading, Defendant to the same extent
 11 incorporates by reference the answers provided herein to those paragraphs.

12 63. Answering Paragraph 63, Defendant lacks sufficient knowledge or
 13 information to form a belief concerning the truth of the factual allegations contained
 14 therein and on that basis denies such allegations. Paragraph 63 further contains legal
 15 conclusions and argument as to which no response is required.

16 64. Answering Paragraph 64, Defendant lacks sufficient knowledge or
 17 information to form a belief concerning the truth of the factual allegations contained
 18 therein and on that basis denies such allegations. Paragraph 64 further contains legal
 19 conclusions and argument as to which no response is required. Moreover, Plaintiff's
 20 allegations in said paragraph are overbroad, vague, and ambiguous and thus
 21 Defendant denies each and every remaining allegation in said paragraph.

22 65. Answering Paragraph 65, Defendant lacks sufficient knowledge or
 23 information to form a belief concerning the truth of the factual allegations contained
 24 therein and on that basis denies such allegations. Paragraph 65 further contains legal
 25 conclusions and argument as to which no response is required. Moreover, Plaintiff's
 26 allegations in said paragraph are overbroad, vague, and ambiguous and thus
 27 Defendant denies each and every remaining allegation in said paragraph.
 28

1 66. Answering Paragraph 66, Defendant denies each and every allegation
2 contained therein.

3 67. Answering Paragraph 67, Defendant denies each and every allegation
4 contained therein.

5 68. Answering Paragraph 68, Defendant denies each and every allegation
6 contained therein.

7 69. Answering Paragraph 69, Defendant is without sufficient knowledge or
8 information to form a belief as to the truth of the allegations contained in said
9 paragraph, on that basis, deny each and every allegation against this Defendant
10 contained herein. Defendant further denies the allegations of said paragraph as they
11 are vague. Defendant denies that Plaintiff is entitled to an award of damages, or any
12 other form of relief as requested in the Complaint as a result of any acts or omissions
13 by this answering Defendant.

14 70. Answering Paragraph 70, Defendant is without sufficient knowledge or
15 information to form a belief as to the truth of the allegations contained in said
16 paragraph, on that basis, deny each and every allegation against this Defendant
17 contained herein. Defendant further denies the allegations of said paragraph as they
18 are vague. Defendant denies that Plaintiff is entitled to an award of damages, or any
19 other form of relief as requested in the Complaint as a result of any acts or omissions
20 by this answering Defendant.

21 71. Answering Paragraph 71, Defendant is without sufficient knowledge or
22 information to form a belief as to the truth of the allegations contained in said
23 paragraph, on that basis, deny each and every allegation against this Defendant
24 contained herein. Defendant further denies the allegations of said paragraph as they
25 are vague. Defendant denies that Plaintiff is entitled to an award of damages, or any
26 other form of relief as requested in the Complaint as a result of any acts or omissions
27 by this answering Defendant.

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SIXTH CLAIM FOR RELIEF

Battery (Wrongful Death)

(Against Defendants COUNTY and DOE DEPUTIES)

72. Answering Paragraph 72, which incorporates by reference the allegations of other paragraphs of the pleading, Defendant to the same extent incorporates by reference the answers provided herein to those paragraphs.

73. Answering Paragraph 73, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein and on that basis denies such allegations. Paragraph 73 further contains legal conclusions and argument as to which no response is required.

74. Answering Paragraph 74, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein and on that basis denies such allegations. Paragraph 74 further contains legal conclusions and argument as to which no response is required. Moreover, Plaintiff's allegations in said paragraph are overbroad, vague, and ambiguous and thus Defendant denies each and every remaining allegation in said paragraph.

75. Answering Paragraph 75, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein and on that basis denies such allegations. Paragraph 75 further contains legal conclusions and argument as to which no response is required. Moreover, Plaintiff's allegations in said paragraph are overbroad, vague, and ambiguous and thus Defendant denies each and every remaining allegation in said paragraph.

76. Answering Paragraph 76, Defendant admits that California Government Code section 815.2(a) states, "a public entity is liable for injury proximately caused by an act or omission of an employee of the public entity within the scope of his employment if the act or omission would, apart from this section, have given rise to a cause of action against the employee or his personal representative". As to the remainder of the allegations contained in said paragraph, Defendant is without

1 sufficient knowledge or information to form a belief as to the truth of the allegations
 2 contained in said paragraph, and on that basis, Defendant denies each and every
 3 allegation. Paragraph 76 further contains legal conclusions and argument as to which
 4 no response is required.

5 77. Answering Paragraph 77, Defendant is without sufficient knowledge or
 6 information to form a belief as to the truth of the allegations contained in said
 7 paragraph, on that basis, deny each and every allegation against this Defendant
 8 contained herein. Defendant further denies the allegations of said paragraph as they
 9 are vague. Defendant denies that Plaintiff is entitled to an award of damages, or any
 10 other form of relief as requested in the Complaint as a result of any acts or omissions
 11 by this answering Defendant.

12 78. Answering Paragraph 78, Defendant is without sufficient knowledge or
 13 information to form a belief as to the truth of the allegations contained in said
 14 paragraph, on that basis, deny each and every allegation against this Defendant
 15 contained herein. Defendant further denies the allegations of said paragraph as they
 16 are vague. Defendant denies that Plaintiff is entitled to an award of damages, or any
 17 other form of relief as requested in the Complaint as a result of any acts or omissions
 18 by this answering Defendant.

19 **SEVENTH CLAIM FOR RELIEF**

20 **Negligence (Wrongful Death)**

21 (Against all Defendants)

22 79. Answering Paragraph 79, which incorporates by reference the
 23 allegations of other paragraphs of the pleading, Defendant to the same extent
 24 incorporates by reference the answers provided herein to those paragraphs.

25 80. Answering Paragraph 80, Defendant denies that the County failed to
 26 properly train and supervise employees and Defendant denies that the County failed
 27 to ensure that adequate numbers of employees with appropriate education and
 28 training were available to meet the needs of and protect the right of Plaintiff. As to

1 the remainder of the allegations contained in said paragraph, Defendant is without
 2 sufficient knowledge or information to form a belief as to the truth of the allegations
 3 contained in said paragraph, and on that basis, Defendant denies each and every
 4 allegation. Paragraph 80 further contains legal conclusions and argument as to
 5 which no response is required. Moreover, Plaintiff's allegations in said paragraph are
 6 overbroad, vague, and ambiguous and thus Defendant denies each and every
 7 remaining allegation in said paragraph.

8 81. Answering Paragraph 81, Defendant is without sufficient knowledge or
 9 information to form a belief as to the truth of the allegations contained in said
 10 paragraph, on that basis, deny each and every allegation against this Defendant
 11 contained herein. Defendant further denies the allegations of said paragraph as they
 12 are vague. Defendant denies that Plaintiff is entitled to an award of damages, or any
 13 other form of relief as requested in the Complaint as a result of any acts or
 14 omissions by this answering Defendant.

15 82. Answering Paragraph 82, Defendant is without sufficient knowledge or
 16 information to form a belief as to the truth of the allegations contained in said
 17 paragraph, on that basis, deny each and every allegation against this Defendant
 18 contained herein. Defendant further denies the allegations of said paragraph as they
 19 are vague. Defendant denies that Plaintiff is entitled to an award of damages, or any
 20 other form of relief as requested in the Complaint as a result of any acts or
 21 omissions by this answering Defendant.

22 **EIGHTH CLAIM FOR RELIEF**

23 **Violation of Cal. Civil Code § 52.1 (Bane Act)**

24 83. Answering Paragraph 83, which incorporates by reference the
 25 allegations of other paragraphs of the pleading, Defendant to the same extent
 26 incorporates by reference the answers provided herein to those paragraphs.

27 84. Answering Paragraph 84, Defendant lacks sufficient knowledge or
 28 information to form a belief concerning the truth of the factual allegations contained

1 therein and on that basis denies such allegations. Paragraph 84 further contains legal
2 conclusions and argument as to which no response is required.

3 85. Answering Paragraph 85, Defendant is without sufficient knowledge or
4 information to form a belief as to the truth of the allegations contained in said
5 paragraph, on that basis, deny each and every allegation against this Defendant
6 contained herein. Defendant further denies the allegations of said paragraph as they
7 are vague. Paragraph 85 further contains legal conclusions and argument as to which
8 no response is required. Moreover, Plaintiff's allegations in said paragraph are
9 overbroad, vague, and ambiguous and thus Defendant denies each and every
10 remaining allegation in said paragraph.

11 86. Answering Paragraph 86, Defendant is without sufficient knowledge or
12 information to form a belief as to the truth of the allegations contained in said
13 paragraph, on that basis, deny each and every allegation against this Defendant
14 contained herein. Defendant further denies the allegations of said paragraph as they
15 are vague. Paragraph 86 further contains legal conclusions and argument as to which
16 no response is required. Moreover, Plaintiff's allegations in said paragraph are
17 overbroad, vague, and ambiguous and thus Defendant denies each and every
18 remaining allegation in said paragraph.

19 87. Answering Paragraph 87, Defendant is without sufficient knowledge or
20 information to form a belief as to the truth of the allegations contained in said
21 paragraph, on that basis, deny each and every allegation against this Defendant
22 contained herein. Defendant further denies the allegations of said paragraph as they
23 are vague. Paragraph 87 further contains legal conclusions and argument as to which
24 no response is required. Moreover, Plaintiff's allegations in said paragraph are
25 overbroad, vague, and ambiguous and thus Defendant denies each and every
26 remaining allegation in said paragraph.

27 88. Answering Paragraph 88, Defendant is without sufficient knowledge or
28 information to form a belief as to the truth of the allegations contained in said

1 paragraph, on that basis, deny each and every allegation against this Defendant
2 contained herein. Defendant further denies the allegations of said paragraph as they
3 are vague. Paragraph 88 further contains legal conclusions and argument as to which
4 no response is required. Moreover, Plaintiff's allegations in said paragraph are
5 overbroad, vague, and ambiguous and thus Defendant denies each and every
6 remaining allegation in said paragraph.

7 89. Answering Paragraph 89, Defendant is without sufficient knowledge or
8 information to form a belief as to the truth of the allegations contained in said
9 paragraph, on that basis, deny each and every allegation against this Defendant
10 contained herein. Defendant further denies the allegations of said paragraph as they
11 are vague. Paragraph 89 further contains legal conclusions and argument as to which
12 no response is required. Moreover, Plaintiff's allegations in said paragraph are
13 overbroad, vague, and ambiguous and thus Defendant denies each and every
14 remaining allegation in said paragraph.

15 90. Answering Paragraph 90, Defendant is without sufficient knowledge or
16 information to form a belief as to the truth of the allegations contained in said
17 paragraph, on that basis, deny each and every allegation against this Defendant
18 contained herein. Defendant further denies the allegations of said paragraph as they
19 are vague. Paragraph 90 further contains legal conclusions and argument as to which
20 no response is required. Moreover, Plaintiff's allegations in said paragraph are
21 overbroad, vague, and ambiguous and thus Defendant denies each and every
22 remaining allegation in said paragraph.

23 91. Answering Paragraph 91, Defendant admits that California Government
24 Code section 815.2(a) states, "a public entity is liable for injury proximately caused
25 by an act or omission of an employee of the public entity within the scope of his
26 employment if the act or omission would, apart from this section, have given rise to
27 a cause of action against the employee or his personal representative". As to the
28 remainder of the allegations contained in said paragraph, Defendant is without

1 sufficient knowledge or information to form a belief as to the truth of the allegations
2 contained in said paragraph, and on that basis, Defendant denies each and every
3 allegation. Paragraph 91 further contains legal conclusions and argument as to which
4 no response is required.

5 92. Answering Paragraph 92, Defendant is without sufficient knowledge or
6 information to form a belief as to the truth of the allegations contained in said
7 paragraph, on that basis, deny each and every allegation against this Defendant
8 contained herein. Defendant further denies the allegations of said paragraph as they
9 are vague. Paragraph 92 further contains legal conclusions and argument as to which
10 no response is required. Moreover, Plaintiff's allegations in said paragraph are
11 overbroad, vague, and ambiguous and thus Defendant denies each and every
12 remaining allegation in said paragraph.

13 93. Answering Paragraph 93, Defendant is without sufficient knowledge or
14 information to form a belief as to the truth of the allegations contained in said
15 paragraph, on that basis, deny each and every allegation against this Defendant
16 contained herein. Defendant further denies the allegations of said paragraph as they
17 are vague. Defendant denies that Plaintiff is entitled to an award of damages, or any
18 other form of relief as requested in the Complaint as a result of any acts or omissions
19 by this answering Defendant.

20 94. Answering Paragraph 94, Defendant is without sufficient knowledge or
21 information to form a belief as to the truth of the allegations contained in said
22 paragraph, on that basis, deny each and every allegation against this Defendant
23 contained herein. Defendant further denies the allegations of said paragraph as they
24 are vague. Defendant denies that Plaintiff is entitled to an award of damages, or any
25 other form of relief as requested in the Complaint as a result of any acts or omissions
26 by this answering Defendant.

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PRAYER FOR RELIEF

In an answer to Plaintiff's Prayer for Relief, Letters A-I, Defendant denies generally and specifically each and every allegation contained therein as it refers to this answering Defendant, and further denies that Plaintiff is entitled to an award of damages, including punitive damages, equitable relief or any other relief as a result of any act or omission by this answering Defendant.

AFFIRMATIVE DEFENSES

As for its separate affirmative defenses, Defendant alleges as follows:

FIRST AFFIRMATIVE DEFENSE**(Failure to State a Cause of Action)**

As a separate and distinct affirmative defense, this answering Defendant alleges the operative Complaint fails to state facts sufficient to constitute a cause of action.

SECOND AFFIRMATIVE DEFENSE**(Failure to Comply with the Governmental Tort Claims Act)**

As a separate and distinct affirmative defense, this answering Defendant alleges that Plaintiff failed to comply with the Government Tort Claims Act, including but not limited to those provisions contained in California Government Code sections 911.2, 945.4, 945.6, 950.2 and 950.6.

THIRD AFFIRMATIVE DEFENSE**(Statute of Limitations)**

As a separate and distinct affirmative defense, this answering Defendant alleges that Plaintiff's claims are barred by the applicable statute of limitations required for ADA claims.

FOURTH AFFIRMATIVE DEFENSE**(Non-Policy Makers)**

As a separate and distinct affirmative defense, this answering Defendant alleges that they are not liable for alleged violation by non-policymakers of civil or constitutional rights.

FIFTH AFFIRMATIVE DEFENSE

(Consent by Plaintiff)

As a separate and distinct affirmative defense, Plaintiff agreed to, and, participated in, those actions which Plaintiff claims to have caused injury or damage. Since such participation and consent were given knowingly and voluntarily, Plaintiff's claims are invalid.

SIXTH AFFIRMATIVE DEFENSE

(Contributory Negligence)

As a separate and distinct affirmative defense, this answering Defendant places in issue the negligence, if any, of all persons which contributed in any degree to the happening of the incident(s) alleged in the operative Complaint, and the degree that such negligence contributed to the incident(s), damages, and/or the injuries sustained as a result of said incident.

SEVENTH AFFIRMATIVE DEFENSE

(Mitigation of Damages)

As a separate and distinct affirmative defense, this answering Defendant alleges Plaintiff failed to take reasonable measures to decrease or eliminate the damages of which Plaintiff now complains.

EIGHTH AFFIRMATIVE DEFENSE

(Exercise of Reasonable Care and Good Faith)

As a separate and distinct affirmative defense, this answering Defendant alleges, at all times relevant herein, Defendant exercised reasonable care and good faith and its conduct was absolutely and/or conditionally legally privileged, and/or justified. Defendant did not know, and in the exercise of reasonable care could not have known, of the alleged acts or allegations in connection within the conditions which are the subject of the Operative Complaint. Defendant therefore alleges that they are not liable for acts made in good faith and under the apparent authority of an enactment that is unconstitutional, invalid or inapplicable and further not liable

1 pursuant to Government Code section 820.6.

2 **NINTH AFFIRMATIVE DEFENSE**

3 **(Third-Party Negligence)**

4 As a separate and distinct affirmative defense, this answering Defendant alleges
5 Plaintiff's alleged injuries, if any, were caused by the negligence, carelessness, fault,
6 strict liability, acts or omissions of third parties for which this answering Defendant
7 have no legal responsibility.

8 **TENTH AFFIRMATIVE DEFENSE**

9 **(Third-Party Negligence/Proportionate Recovery)**

10 As a separate and distinct affirmative defense, this answering Defendant alleges
11 Plaintiff's damages, if any, contained in the operative Complaint, were caused by
12 persons and/or entities other than this answering Defendant, who failed to exercise
13 ordinary care, caution or prudence and were negligent in their dealing with Plaintiff,
14 and that at all times, said persons or entities were acting without consent,
15 authorization, knowledge and/or ratification of this answering Defendant.
16 Accordingly, any recovery against Defendant by Plaintiff, if any, must be precluded
17 and/or reduced in a proportionate amount to the fault on the part of such other persons
18 and/or entities.

19 **ELEVENTH AFFIRMATIVE DEFENSE**

20 **(Intervening and Superseding Actions)**

21 As a separate and distinct affirmative defense, this answering Defendant alleges
22 the injuries and damages sustained by Plaintiff if any, were proximately caused by the
23 intervening and superseding actions of others, which intervening and superseding
24 actions bar and/or diminish Plaintiff's recovery, if any, against this answering
25 Defendant.

26 **TWELFTH AFFIRMATIVE DEFENSE**

27 **(No Causal Connection)**

28 As a separate and distinct affirmative defense, this answering Defendant alleges

1 Plaintiff failed to plead or describe a causal connection between the alleged damages
2 and the alleged acts or omissions of this answering Defendant.

3 **THIRTEENTH AFFIRMATIVE DEFENSE**

4 **(Comparative Fault)**

5 As a separate and distinct affirmative defense, this answering Defendant alleges
6 that any injury alleged in the operative Complaint was directly or proximately caused
7 and contributed to by the actions of other persons. Therefore, Plaintiff's recovery
8 against Defendant, if any, should be reduced in proportion to the percentage of
9 responsibility attributable to persons or entities other than Defendant.

10 **FOURTEENTH AFFIRMATIVE DEFENSE**

11 **(Substantial Factor)**

12 As a separate and distinct affirmative defense, this answering Defendant alleges
13 that the negligence, if any, of this Defendant were not a substantial factor in bringing
14 about Plaintiff's alleged injuries and, therefore, was not a contributing cause thereof,
15 but was superseded by the negligence of others, whose negligence was an
16 independent, intervening and proximate cause of any injury or damage suffered by
17 the Plaintiff.

18 **FIFTEENTH AFFIRMATIVE DEFENSE**

19 **(Cause in Fact)**

20 As a separate and distinct affirmative defense, this answering Defendant alleges
21 the Operative Complaint, and each claim contained therein, is barred on the ground
22 that this answering Defendant was not the cause in fact of any alleged damage, injury
23 or loss to Plaintiff, if any.

24 **SIXTEENTH AFFIRMATIVE DEFENSE**

25 **(Substantial Cause)**

26 As a separate and distinct affirmative defense, this answering Defendant alleges
27 that the Operative Complaint, and each claim contained therein, is barred on the
28 ground that that this answering Defendant was not a substantial cause of any alleged

1 damage, injury or loss to Plaintiff.

2 **SEVENTEENTH AFFIRMATIVE DEFENSE**

3 **(Claims against Government Entities)**

4 As a separate and distinct affirmative defense, this answering Defendant alleges
5 this action is barred pursuant to Government Code sections 905, 911.4, 945.4, and
6 945.6. et seq.

7 **EIGHTEENTH AFFIRMATIVE DEFENSE**

8 **(Immunity)**

9 As a separate and distinct affirmative defense, this answering Defendant alleges
10 that Plaintiff's claims against these Defendant is barred as Defendant is immune from
11 the allegations set forth in the operative Complaint.

12 **NINETEENTH AFFIRMATIVE DEFENSE**

13 **(Sovereign Immunity)**

14 As a separate and distinct affirmative defense, this answering Defendant alleges
15 that it is not liable for alleged violation by non-policymakers of civil or constitutional
16 rights.

17 **TWENTIETH AFFIRMATIVE DEFENSE**

18 **(Government Code Title 1, Division 3.6, part 2, Chapter 1)**

19 As a separate and distinct affirmative defense, this answering Defendant alleges
20 that the operative Complaint and each purported cause of action contained therein,
21 does not state facts sufficient to constitute a cause of action.

22 **TWENTY-FIRST AFFIRMATIVE DEFENSE**

23 **(Governmental Immunities)**

24 As a separate and distinct affirmative defense, this answering Defendant alleges
25 that the operative Complaint, and each cause of action contained therein, is barred as
26 Defendant is entitled to statutory immunities under Government Code sections 815,
27 815.2, 815.6, 818, 818.2, 818.6, 818.8, 820, 820.2, 820.4, 820.6, 820.8, 821, 821.4,
28 and 840.

TWENTY-SECOND AFFIRMATIVE DEFENSE

(Immunity for Adoption or Failure to Adopt or Enforce a Law)

As a separate and distinct affirmative defense, this answering Defendant alleges that it is not liable pursuant to statute by operation of Government Code sections 818.2 or 821 for the adoption or failure to adopt or enforce any law.

TWENTY-THIRD AFFIRMATIVE DEFENSE

(Immunity for Acts of Third Parties)

Defendant alleges that it is not liable for the negligent act or omission of a third party or another person, pursuant to statute by operation of Government Code sections 820.8, 815.2(b) and 815.4.

TWENTY-FOURTH AFFIRMATIVE DEFENSE

(Acts or Omissions by Others)

As a separate and distinct affirmative defense, this answering Defendant alleges that it is not liable by operation of Government Code sections 815.2(b) and 820.8, in that the injuries and damages, if any, were caused by the acts or omissions of other persons, not employees or agents of Defendant COUNTY OF LOS ANGELES.

TWENTY-FIFTH AFFIRMATIVE DEFENSE

(Absolute Immunity)

As a separate and distinct affirmative defense, this answering Defendant alleges that Plaintiff's claims against this answering Defendant is barred as Defendant has absolute immunity from the allegations set forth in the operative Complaint.

TWENTY-SIXTH AFFIRMATIVE DEFENSE

(Qualified Immunity)

As a separate and distinct affirmative defense, this answering Defendant alleges that Plaintiff's claims against this answering Defendant is barred as Defendant has qualified immunity from the allegations set forth in the operative Complaint.

TWENTY-SEVENTH AFFIRMATIVE DEFENSE

(Immunity for Civil Damages)

1 As a separate and distinct affirmative defense, answering Defendant alleges
2 that it is shielded from liability for civil damages insofar as their conduct did not
3 violate any statutory or constitutional right of which a reasonable person would have
4 known.

5 **TWENTY-EIGHTH AFFIRMATIVE DEFENSE**

6 **(Immunity for Execution or Enforcement of Laws)**

7 Defendant alleges that it is not liable pursuant to statute by operation of
8 *Government Code* sections 815.2(b), 815.4 and 820.4 for the execution or
9 enforcement of the law by public officers or employees exercising due care.

10 **TWENTY-NINTH AFFIRMATIVE DEFENSE**

11 **(Other Immunities for Public Entities)**

12 Defendant alleges that it is not liable for any injuries alleged in the operative
13 Complaint pursuant to statute by operation of *Government Code* section 815.3.

14 **THIRTIETH AFFIRMATIVE DEFENSE**

15 **(Legally Privileged or Justified)**

16 Defendant alleges that the conduct, if any, which is the subject of Plaintiff's
17 operative Complaint was absolutely and/or conditionally legally privileged and/or
18 justified. Furthermore, all actions by Defendant were in good faith and reasonable.

19 **THIRTY-FIRST AFFIRMATIVE DEFENSE**

20 **(Statute of Limitations)**

21 As a separate and distinct affirmative defense, this answering Defendant alleges
22 the operative Complaint is barred by the applicable statute of limitations including,
23 but not limited to *California Code of Civil Procedure* sections 225.1, 340, 340.8, 342,
24 335.1, 583.210, and/or *Government Code* section 810 et seq.

25 **THIRTY-SECOND AFFIRMATIVE DEFENSE**

26 **(Uncertainty)**

27 As a separate and distinct affirmative defense, this answering Defendant alleges
28 the causes of action in the operative Complaint, and each of them, are uncertain and

1 ambiguous as to the Plaintiff's claims for damages against this answering Defendant.

2 **THIRTY-THIRD AFFIRMATIVE DEFENSE**

3 **(Unclean Hands)**

4 As a separate and distinct affirmative defense, this answering Defendant alleges
5 that Plaintiff are barred from recovery under the operative Complaint, and each claim
6 for relief therein, by the doctrine of unclean hands.

7 **THIRTY-FOURTH AFFIRMATIVE DEFENSE**

8 **(Estoppel and Res Judicata)**

9 As a separate and distinct affirmative defense, this answering Defendant alleges
10 that Plaintiff is barred from recovery under the operative Complaint, and each claim
11 for relief therein, by the doctrines of estoppel and res judicata.

12 **THIRTY-FIFTH AFFIRMATIVE DEFENSE**

13 **(Indemnification)**

14 As a separate and distinct affirmative defense, if any liability exists on the part
15 of this answering Defendant to Plaintiff, such liability is to be completely or partially
16 indemnified by another party.

17 **THIRTY-SIXTH AFFIRMATIVE DEFENSE**

18 **(Laches)**

19 As a separate and distinct affirmative defense, this answering Defendant alleges
20 that the operative Complaint, and each cause of action contained therein, is barred
21 pursuant to the equitable doctrine of laches.

22 **THIRTY-SEVENTH AFFIRMATIVE DEFENSE**

23 **(Waiver)**

24 As a separate and distinct affirmative defense, this answering Defendant alleges
25 that the operative Complaint, and each claim contained therein, is barred pursuant to
26 the equitable doctrine of waiver.

27 **THIRTY-EIGHTH AFFIRMATIVE DEFENSE**

28 **(Joint and Several Obligations)**

1 As a separate and distinct affirmative defense, any recovery by Plaintiff
2 pursuant to the operative Complaint, and each purported cause of action contained
3 therein, is governed, controlled, and limited by the provisions of California Civil Code
4 sections 1431 *et seq.*

5 **THIRTY-NINTH AFFIRMATIVE DEFENSE**

6 **(Negligent Hiring by Others)**

7 As a separate and distinct affirmative defense, this answering Defendant alleges
8 that other parties are liable for the hiring and supervision of their employees, general
9 contractor, professionals, and other subcontractors, which were negligent and actually
10 caused all or some of the damages suffered by Plaintiff herein.

11 **FORTIETH AFFIRMATIVE DEFENSE**

12 **(Exercised Reasonable Diligence)**

13 As a separate and distinct affirmative defense, this answering Defendant alleges
14 that it is not liable for the failure to discharge a mandatory duty in that it exercised
15 reasonable diligence in the discharge of all duties as provided by Government Code
16 sections 815.2(b) and 815.6.

17 **FORTY-FIRST AFFIRMATIVE DEFENSE**

18 **(Course and Scope)**

19 As a separate and distinct affirmative defense, this answering Defendant alleges
20 that any recovery on the operative Complaint is barred to the extent that the wrongful
21 conduct of any employee(s) of this answering Defendant alleged by Plaintiff were
22 outside the course and scope of employment.

23 **FORTY-SECOND AFFIRMATIVE DEFENSE**

24 **(Immunity for Discretionary Acts)**

25 As a separate and distinct affirmative defense, this answering Defendant alleges
26 that pursuant to Government Code sections 815(b), 815.4 and 820.2, a public entity
27 and its employees, officers and agents are not responsible for injury and damages
28 resulting from the act or omission that was a result of an exercise of discretion vested

1 in such officer, employee or agent.

2 **FORTY-THIRD AFFIRMATIVE DEFENSE**

3 **(No Entitlement to Exemplary/Punitive Damages)**

4 As a separate and distinct affirmative defense, this answering Defendant alleges
5 that as a public entity, it is not liable for punitive damages pursuant to statute by
6 operation of Government Code section 818.

7 **FORTY-FOURTH AFFIRMATIVE DEFENSE**

8 **(Immunity of Public Entities)**

9 As a separate and distinct affirmative defense, this answering Defendant alleges
10 that they are not liable for an injury whether such injury arises out of an act or
11 omission of the public entity or a public employee or any other person pursuant to
12 Government Code Sections 815 and 820, et seq.

13 **FORTY-FIFTH AFFIRMATIVE DEFENSE**

14 **(Immunity Under Government Code section 855.6)**

15 As a separate and distinct affirmative defense, this answering Defendant alleges
16 that they are immune from the causes of action in Plaintiff's operative Complaint due
17 to the application of Government Code section 855.6.

18 **FORTY-SIXTH AFFIRMATIVE DEFENSE**

19 **(Immunity Under Government Code section 856)**

20 As a separate and distinct affirmative defense, this answering Defendant alleges
21 that they are immune from the causes of action in Plaintiff's operative Complaint due
22 to the application of Government Code section 856.

23 **FORTY-SEVENTH AFFIRMATIVE DEFENSE**

24 **(Excessive, Unreasonable and Inflated Damages)**

25 As a separate and distinct affirmative defense, this answering Defendant assert
26 that the damages alleged by Plaintiff are inflated in that the nature and extent of
27 injuries and damages purportedly suffered by Plaintiff as a result of the events
28 described in their operative Complaint are excessive, unreasonable and unnecessary.

FORTY-EIGHTH AFFIRMATIVE DEFENSE**(Offset)**

As a separate and distinct affirmative defense, this answering Defendant alleges that they are entitled to an offset and/or reduction as to any amounts paid in compensation for Plaintiff's alleged damages by way of contribution, settlement or judgment of any claims, incident or lawsuit.

FORTY-NINTH AFFIRMATIVE DEFENSE**(Self-Defense and Defense of Others)**

As a separate and distinct affirmative defense, this answering Defendant alleges that the force used was caused and necessitated by the actions of the Plaintiff, and was reasonable and necessary for self-defense and defense of others.

FIFTIETH AFFIRMATIVE DEFENSE**(No Entitlement to Attorneys' Fees and Costs)**

As a separate and distinct affirmative defense, this answering Defendant alleges that Plaintiff is not entitled to attorneys' fees and costs.

FIFTY-FIRST AFFIRMATIVE DEFENSE**(Other Defenses Reserved)**

Defendant COUNTY OF LOS ANGELES presently has insufficient knowledge or information upon which to form a belief as to whether it may have additional, as yet unstated, affirmative defenses available. Defendant reserves herein the right to assert additional affirmative defenses in the event discovery indicates that they would be appropriate.

WHEREFORE, this answering Defendant prays for judgment as follows:

1. That Plaintiff takes nothing by reason of her Complaint and that judgment be entered in favor of answering Defendant;
2. Plaintiff's Complaint be dismissed with prejudice;
3. That answering Defendant recover costs of suit incurred herein, including

1 reasonable attorneys' fees; and
2 For such other relief as the Court deems proper and just.

3 DATED: July 3, 2024 HURRELL CANTRALL LLP

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By: /s/ Janet J. Hur

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THOMAS C. HURRELL

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JANET J. HUR

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Attorneys for Defendant, COUNTY OF
LOS ANGELES

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HURRELL CANTRALL LLP
725 S. FIGUEROA STREET, SUITE 3800
LOS ANGELES, CALIFORNIA 90017
TELEPHONE (213) 426-2000

DEMAND FOR JURY TRIAL

Defendant COUNTY OF LOS ANGELES hereby respectfully demands a trial by jury in the above-entitled action. This demand is made as to all claims, matters and issues to which they may legally be entitled to demand a jury.

DATED: July 3, 2024

HURRELL CANTRALL LLP

By: /s/ Janet J. Hur

THOMAS C. HURRELL

JANET J. HUR

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